

TIFFANY Y. RICHARDSON, Plaintiff, v. CONTOUR COMPANIES, Defendant.)))))))))	CIVIL ACTION NUMBER: <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/>
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In her Complaint, Richardson invokes jurisdiction pursuant to “Title VII of the Civil Rights Act of 1964, as amended as well as the Americans with Disabilities Act, as amended (“ADAA”); 42 U.S.C. 12101, et seq.” *See* Complaint at p. 1. Title VII, the ADAA, and 28 U.S.C. § 1441 confer upon this court original jurisdiction over Richardson’s claims. Although Richardson alleges in her Complaint that she “has initiated her EEOC charge and received her ‘Notice of Right to Sue’ letter pursuant to Title VII and ADA prior to filing this complaint,” no EEOC charge or

right-to-sue letter is attached to her complaint or otherwise in the record in the State Court Action.

The Complaint names “Contour Companies” as the defendant. On information and belief, “Contour Companies” is not a legal entity. To the extent Richardson intended (but failed) to sue Contour Companies LLC (“Contour LLC”), Contour LLC removes the State Court Action to this court. Contour LLC denies that it has ever been Richardson’s employer as Title VII or the ADAA define “employer” and similarly denies that she has ever been an employee of Contour LLC as defined by those statutes.

A Charge of Discrimination Richardson filed on or about December 8, 2020, in which she names “Contour Companies” as the employer she believes discriminated against her is attached hereto as Exhibit 3. The EEOC charge bears case number 420-2021-00582. On or about April 22, 2021, the EEOC issued a Dismissal and Notice of Rights in case number 420-2021-00582. A copy of the Dismissal and Notice of Rights is attached hereto as Exhibit 4.

/s/William K. Hancock

William K. Hancock

Attorney for Contour Companies LLC

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of November, 2021, I will serve all attorneys of record as follows:

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/s/William K. Hancock
Of Counsel